



STATE OF ALASKA
DEPARTMENT OF
COMMERCE
COMMUNITY AND
ECONOMIC DEVELOPMENT

Bill Walker, Governor
Chris Hladick, Commissioner
T.W. Patch, Chairman

Regulatory Commission of Alaska **Received & Inspected**

September 15, 2015

SEP 21 2015

FCC Mail Room

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Karen Majcher
Vice President – High Cost
& Low Income Division
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036

RE: Alaska Qualified Certification of Support for High Cost Eligible Telecommunications Carriers Pursuant to 47 C.F.R. § 54.314, WC Docket No. 10-90, and Special Statement Concerning Wireless Deployment in Rural Alaska.

To the Filing Representatives:

The Regulatory Commission of Alaska (RCA) hereby certifies, to the best of its knowledge and based on affidavits filed by the Eligible Telecommunications Carriers (ETCs) listed in Attachment A, that all federal high cost support provided to ETCs in Alaska during 2014, and that will be provided during 2016, either has been or will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 254(e).

This certification in no way precludes the RCA from a further detailed review into how any carrier has deployed its federal universal service support, nor from ordering the support be used in conformance with RCA directives or policies. This certification does not bind the RCA in any current or future matter involving any carrier to which this certification applies.

Special Statement Concerning Rural Alaska Wireless Facilities Deployment and the Need for Stable Support Mechanism

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While the RCA certifies to the past use of high cost support by each of the ETCs we have designated in Alaska, we note that several competitive (wireless) ETCs have indefinitely deferred deploying wireless facilities to nearly 50 rural exchanges across Alaska, many of which do not enjoy the benefits of a competing wireless carrier and are therefore without wireless voice service of any kind or quality. Upon designation as a competitive ETC by the RCA, each carrier made commitments to provide supported wireless services throughout a designated study area upon reasonable request, either through its own facilities or through resale or roaming agreements.¹ The Commission notes that, by and large, these ETCs took on often risky commitments with the expectation that high cost support would be available to mitigate these risks. The ETCs with unfulfilled wireless deployment commitments each cite the ongoing destabilizing impact from the FCC's Transformation Order² and the accompanying uncertainty of the legacy high cost support as major factors in decisions to indefinitely defer deployment to many of these rural exchanges.³

The RCA believes that wireless service is vital to all Alaskans and desires universal telecommunications service throughout the state. However, the RCA remains convinced that the logistics of providing wireless voice service to rural and often remote Alaska villages are uniquely challenging due in part to (1) enhanced construction and materials procurement costs, (2) expensive call transport costs resulting from limited middle mile infrastructure, and (3) few customers to defray those costs. These and other anomalies compound the uncertain business case for extending wireless and broadband service to these rural exchanges created by the Transformation Order, and make all the more

¹ See Alaska Administrative Code 3 AAC 53.410(a)(7)(A), which provides:

A common carrier seeking designation as an eligible telecommunications carrier must file, for each study area or portion of a study area where eligible telecommunications carrier designation is sought, a request that includes ... a commitment to provide service on a timely basis to requesting customers throughout the common carrier's eligible telecommunications carrier service area using its own facilities or a combination of its own facilities and resale in accordance with the common carrier's network deployment plan filed under 3 AAC 53.420 and revised under 3 AAC 53.460(a)(1).

² In the Matter of Connect America Fund (WC Docket No. 10-90) et al., *Report and Order and Further Notice of Proposed Rulemaking*, 26 FCC Rcd 17633 (released November 18, 2011).

³ See e.g., RCA Docket U-15-051, July 1, 2015 Supplemental Filing by GCI Communications Corp. d/b/a GCI, Responding to Staff Questions regarding Unserved Exchanges; RCA Docket U-15-048, OTZ Telecommunications, LLC, Responses to Staff Questions, dated June 12, 2015; and RCA Docket U-15-042, New Cingular Wireless PCS, LLC d/b/a AT&T Mobility, Unserved Exchange Responses, dated July 1, 2015.

In highlighting this issue, the RCA notes that none of these three ETCs reported any customer denials of service in any of the unserved exchanges during 2014, though the RCA did not determine whether any service advertisements directly targeted any unserved exchange, which are generally remote, off the limited Alaska road system, and may have no reliable periodical in which to plausibly advertise.

reasonable the legitimate business concerns these ETCs with unfulfilled deployment commitments have raised before us.

The RCA believes that from a public safety and economic perspective, access to properly supported wireless service is vital to rural Alaska, especially for currently unserved communities. As it is clear that the FCC has now pivoted toward next generation universal broadband service, the RCA is concerned about a distinct possibility that rural Alaska's most basic telecommunications needs are in danger of being overlooked. The RCA takes particular note of President Obama's recent trip to Alaska, and his statements that indicated a clear intent to address the plight many rural Alaska communities face in this increasingly unsettled future in line with his goal to make the United States an "Arctic power," noting that "we are going to have to help communities be resilient."⁴ These communities for which the President advocates are precisely the communities that now face the prospect of an even wider gulf in the availability of telecommunications services, access to which is now treated as virtually an inalienable right by the rest of the country.

In the President's speech in Kotzebue, on Alaska's northwest coast, he highlighted the importance that access to broadband service has on educational opportunities, noting that Kotzebue schools now have wireless broadband access even while acknowledging that most of those students do not have broadband in their homes.⁵ We note that eight communities surrounding Kotzebue have no wireless voice service because the designated CETC cannot reasonably take on the substantial debt necessary to build out a broadband capable wireless network without adequate assurances of ongoing support. The RCA feels that the President's imploring the nation and the world to take up rural Alaska's very real environmental plight along with his call to make the United States an "Arctic power" would ring particularly hollow if linked federal efforts are not made to bring modern telecommunications services to those very same communities that the President noted were on the leading edge of climate change.

Therefore, with its certification of high cost support, the RCA urges the FCC to (1) take up the President's strategic focus on the Arctic by making telecommunications infrastructure across Alaska a stated priority, (2) continue to engage with Alaska carriers to address the potential gaps in the FCC's new broadband paradigm through which many of Alaska's most vulnerable customers are at risk of falling, and (3) quickly provide fair, ongoing, and stable subsidies necessary to build that telecommunications

⁴ A full transcript of President Obama's August 31, 2015 speech to the GLACIER conference is available at <http://www.ktuu.com/news/news/full-text-of-president-obamas-speech/35027560> (last visited September 3, 2015).

⁵ A full transcript of President Obama's September 2, 2015 speech in Kotzebue, Alaska is available at <http://www.adn.com/article/20150903/transcript-president-obamas-speech-kotzebue-middlehigh-school> (last visited September 3, 2015).

infrastructure and which would attach firm, near-term deployment deadlines for the ETCs that may receive them.

Sincerely,

REGULATORY COMMISSION OF ALASKA



T.W. Patch
Chairman

Cc: ETC List

Received & inspected

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ATTACHMENT A

FCC Mail Room

ETC Name	Study Area Code	USAC Study Area Name	ETC Type	
ACS of Alaska, LLC	613022 613012	ACS-AK Greatland ACS-AK Juneau	ILEC	Rural
ACS of Anchorage, LLC	613000	ACS of Anchorage	ILEC	Non-Rural
ACS of Fairbanks, LLC	613008	ACS-Fairbanks, Inc.	ILEC	Rural
ACS of the Northland, LLC	613010 613020	ACS-N Glacier State ACS-N Sitka	ILEC	Rural
Adak Eagle Enterprises d/b/a/ Adak Telephone Utility	610989	Adak Tel. Utility	ILEC	Rural
Alaska Telephone Company	613017	Alaska Tel. Co. (All exchanges served, including previous GTE Exchanges)	ILEC	Rural
Arctic Slope Telephone Association Cooperative, Inc.	613001	Arctic Slope Tel.	ILEC	Rural
Bettles Telephone, Inc.	613002	Bettles Tel. Co. Inc.	ILEC	Rural
Bristol Bay Telephone Cooperative, Inc.	613003	Bristol Bay Tel Coop.	ILEC	Rural
Bush-Tell	613004	Bush-Tell Inc.	ILEC	Rural
Circle Telephone and Electric, LLC	613005	Circle Utilities	ILEC	Rural
Cordova Telephone Cooperative, LLC	613007	Cordova Tel. Coop.	ILEC	Rural
Copper Valley Telephone Cooperative, Inc.	613006	Copper Valley Tel.	ILEC	Rural
GCI Communications Corp. SAC # 619001 ⁶	613000 613001 613007 613006 613008 613010 613022 613012 613013 613015	ACS of Anchorage Arctic Slope Tel. Cordova Tel. Coop. Copper Valley Telephone ACS-Fairbanks, Inc. ACS-N Glacier State ACS-AK Greatland ACS-AK Juneau Ketchikan Public UT Matanuska Tel. Assoc.	CLEC	Rural and Non-Rural
Interior Telephone Company, Inc.	613011	Interior Tel. Co. Inc. (All Exchanges served, including previous	ILEC	Rural

⁶ Although GCI continues to report all wireline lines (in both AK remote and AK non-remote areas as defined in 47 C.F.R. § 54.307(e)(3)(i)) under SAC number 619001, since January of 2012, USAC no longer reports GCI's AK non-remote wireline disbursements under SAC number 619001; instead USAC reports GCI's AK non-remote wireline disbursements under SAC number 989004.

ETC Name	Study Area Code	USAC Study Area Name	ETC Type	
		GTE areas of Seward/Moose Pass)		
Ketchikan Public Utilities	613013	Ketchikan Public UT	ILEC	Rural
Matanuska Telephone Association, Inc.	613015	Matanuska Tel. Assoc.	ILEC	Rural
Mukluk Telephone Company, Inc.	613016	Mukluk Tel. Co. Inc.	ILEC	Rural
North Country Telephone, Inc.	613026	North Country Tel. Co.	ILEC	Rural
Nushagak Electric & Telephone Cooperative, Inc.	613018	Nushagak Elec. & Tel.	ILEC	Rural
OTZ Telephone Cooperative, Inc.	613019 619011	OTZ Tel. Cooperative OTZ Telecommunications, Inc.	ILEC	Rural
Summit Telephone and Telegraph Company of Alaska, Inc.	613028	Summit Tel. & Tel-AK	ILEC	Rural
United-KUC, Inc.	613023	United Utilities Inc. (United KUC) ⁷	ILEC	Rural
United Utilities, Inc.	613023	United Utilities Inc.	ILEC	Rural
Yukon Telephone Company	613025	Yukon Tel. Co. Inc.	ILEC	Rural
ACS Wireless, Inc. ⁸	613000 613017 613006 613008 613010 613022 613012 613013 613015	ACS of Anchorage Alaska Tel. Co. Copper Valley Tel. ACS-Fairbanks ACS-N Glacier State ACS-AK Greatland ACS-AK Juneau Ketchikan Public UT Matanuska Tel. Assoc.	CMRS	Rural & Non Rural
ASTAC Wireless, LLC SAC# 619010	611449 613001	Former GTE Exchange of Barrow Arctic Slope Tel.	CMRS	Rural
Bristol Bay Cellular Partnership	619008 613018	Bristol Bay Cellular Partnership Nushagak Elec. & Tel.	CMRS	Rural
Copper Valley Wireless, LLC Tribal Mobility SAC#s 618306 - 618316	619006 613006 613007	Copper Valley Wireless Copper Valley Telephone Cordova Tel. Coop.	CMRS	Rural
Cordova Wireless	619007	Cordova Tel. Coop.	CMRS	Rural

⁷ United Utilities, Inc. and United KUC are separate but affiliated entities with separate intrastate study areas and separate ETC designations; however, for high cost purposes they are designated as a single study area by USAC and the FCC.

⁸ ACS Wireless completed an asset transfer and customer migration in February of 2015 and received high cost support through the first quarter of 2015. The Commission's certification for this carrier is therefore limited only use of support in the prior year (2014).

ETC Name	Study Area Code	USAC Study Area Name	ETC Type	
Communications, LLC	613010	ACS-N Glacier State (Yakutat only) ⁹		
New Cingular Wireless PCS, LLC d/b/a AT&T Mobility SAC# 619004, 989001	613000	ACS of Anchorage	CMRS	Rural & Non Rural
	613022	ACS-AK Greatland		
	613012	ACS-AK Juneau		
	613008	ACS-Fairbanks, Inc.		
	613010	ACS-N Glacier State		
	613017	Alaska Tel Co.		
	613006	Copper Valley Telephone		
	613013	Ketchikan Public UT		
	613015	Matanuska Tel. Assoc.		
GCI Communications Corp. (as a wireless provider) SAC # 619014 ¹⁰ - Mobility SAC #s 618001 – 618218 - Tribal Mobility SAC #s 618317 - 618367	610989	Adak Tel. Utility	CMRS	Rural & Non Rural
	613000	ACS of Anchorage		
	613001	Arctic Slope Tel.		
	613003	Bristol Bay Tel. Coop.		
	613004	Bush-Tell		
	613007	Cordova Tel. Coop.		
	613006	Copper Valley Telephone Cooperative Inc.		
	613008	ACS-Fairbanks, Inc.		
	613010	ACS-N Glacier State		
	613022	ACS-AK Greatland		
	613011	Interior Tel. Co. Inc.		
	613012	ACS-AK Juneau		
	613013	Ketchikan Public UT		
	613015	Matanuska Tel. Assoc.		
	613016	Mukluk Tel. Co. Inc.		
	613017	Alaska Tel. Co.		
	613018	Nushagak Elec. & Tel.		
	613019	OTZ Tel. Cooperative		
	613020	ACS-N Sitka		
	613023	United Utilities Inc.		
	613023	United Utilities Inc. (United KUC) ¹¹		
	613025	Yukon Tel. Co. Inc.		
MTA Communications, LLC, d/b/a MTA Wireless	619003	Matanuska-Kenai, Inc.	CMRS	Rural

⁹ In 2013, the Commission designated Cordova Wireless Communications, LLC as a wireless ETC for the Yakutat exchange, within the ACS-N Glacier State study area; therefore its support certification regarding this study area is on a prospective basis only.

¹⁰ Although GCI continues to report all wireless lines (in both AK remote and AK non-remote areas as defined in 47 C.F.R. § 54.307(e)(3)(i)) under SAC number 619014, since January of 2012, USAC no longer reports GCI's AK non-remote wireless disbursements under SAC number 619014; instead USAC reports GCI's AK non-remote wireless disbursements under SAC number 989007. In addition, USAC now reports AK non-remote wireless disbursements for certain other wireless carriers using the following SAC numbers: AT&T Mobility, 989001; MTA Wireless, 989005; and ACS Wireless, 989006.

¹¹ United Utilities, Inc. and United KUC are separate but affiliated entities with separate intrastate study areas and separate ETC designations; however, for high cost purposes they are designated as a single study area by USAC and the FCC.

ETC Name	Study Area Code	USAC Study Area Name	ETC Type	
TelAlaska Cellular, Inc.	619013	TelAlaska Cellular, Inc.	CMRS	Rural
OTZ Telecommunications, Inc.	619011 613019	OTZ Telecommunications, Inc. OTZ Telephone Cooperative	CMRS	Rural
Windy City Cellular, LLC	619012	Windy City Cellular	CMRS	Rural
City of Ketchikan d/b/a KPU Wireless	613013	Ketchikan Public UT	CMRS	Rural